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Caleb L. Nichols, Esq.  
P.O. Box 1585  
Erie, PA 16507

**RE: Wagner v. Crawford Central School District, et al.  
Civil Action No. 04-264 Erie**

Dear Mr. Nichols:

Enclosed are Defendants' Responses to Plaintiff's Fourth  
Request for Production of Documents.

Very truly yours,

KNOX McLAUGHLIN GORNALL &  
SENNETT, P.C.



Mark J. Kuhar

MJK/hm  
Enclosures  
# 645846

c: Charles E. Heller, III, Assistant Superintendent  
Crawford Central School District

Richard S. McEwen, Esq.  
Pennsylvania State Education Association

OF COUNSEL:  
WILLIAM C. SENNETT  
EDWIN L.R. MCKEAN

- (9) Provide the following documents relating to the hiring of Brian Mahoney as a teacher for the 2002/2003 school year (classroom observation results).

**ANSWER:**

**OBJECTION. Plaintiff's Request No. 9 is not relevant and is not reasonably calculated to lead to the discovery of relevant information. Mr. Mahoney held a position requiring a secondary education certificate during the 2002-03 school year.**

- (10) Provide a list of all substitutes who work under an emergency permit involving the location and dates worked since school year 2001.

**ANSWER:**

**Defendants are investigating whether the requested information is available and will address their findings with Plaintiff in the immediate future.**

- (11) Produce classroom observation summary results for all applicants who were hired in school year 2004/5 and whose names are noted below:

**ANSWER:**

**Defendants do not possess and/or control any documents responsive to Plaintiff's Request No. 11.**

- (a) Robert Bazylak;
- (b) Amy Lawrence;
- (c) Lori Carr;
- (d) Megan Porter;
- (e) Mark Weathers;
- (f) Danielle Morris;
- (g) Brian Mahoney;
- (h) Catherine Bainbridge;
- (i) Cheryl Krachkowski;
- (j) Tammy Foster;
- (k) Nikki Shearer;
- (l) Ann McElwain;

- (m) Chad Dupont;
- (n) Susan Ford;
- (o) Erin Bourguin;
- (p) Lisa Taormina;
- (q) Rebecca Resinger Kelly;
- (r) Leslie Jensen;
- (s) Marcie Hamilton Pifer;
- (t) Karen Jamieson;
- (u) Jennifer M. Stefanucci;

**Plaintiff's Exhibit II**

Produce Rowena Wagner's personnel file for inspection and note-taking.

**ANSWER:**

**Plaintiff's personnel file has been provided previously.**

**Plaintiff's Exhibit III**

Produce for inspection and copying all computer and electronically created and stored records commencing with the 2001/2003 school year and continuing up to and including the 2005/2006 school year including text files, graphic files, system files, data base, e-mail and inter-office memoranda and correspondence which relates to the application of Rowena Wagner for a teaching position with the Crawford Central School District and the administrative complaint that she filed with the Pennsylvania Human Relation Commission and the lawsuit that she filed in the United States District Court for the Western District of Pennsylvania. As well, any correspondence pertaining to her spouse, Bernard Wagner, is also requested to be made available for inspecting and copying.

**ANSWER:**

**The District possesses no such emails that are not covered by the attorney-client privilege and/or the litigation work product.**